

**RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)**

Emanuel Kataev <Emanuel@mllaborlaw.com>

Thu 1/4/2024 4:56 PM

To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>

Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>

Hi, Rita:

When we confirmed deposition dates, we assumed that you only wanted to depose Defendants Robert Russo and Giuseppe Vacca. Unfortunately, we are not available on January 11 nor January 12 to depose Frank Russo, who is no longer a party in this case.

Separately, we write to confirm that Plaintiff Kalief William's deposition will proceed in person on Friday, January 12, 2024 at our office.

Finally, you produced an unnotarized affidavit from Danielle Silva in your Thursday, December 28, 2023 document production and referenced that affidavit during today's deposition of Defendant Robert Russo. We would like to depose her. Please advise as to whether you will voluntarily produce Danielle Silva and, if not, kindly provide her last known address and any other contact information in Plaintiff's position.

Thanks and best,

**Emanuel Kataev, Esq.**

**Partner**

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**From:** Rita Sethi <rsethi@stollglickman.com>

**Sent:** Wednesday, January 03, 2024 4:29 PM

**To:** Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>

**Cc:** Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>

**Subject:** Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi Emanuel:

Below is the link for Robbie's deposition tomorrow at 10 AM to share with your client as well.

Again, please advise if Frank Russo is available on January 10 or January 11 for his deposition and send the link for Kalief's deposition on January 12.

Thanks,  
Rita

Topic: Williams vs The Russo's Payroll Group et al  
Time: Eastern Time (US and Canada)

Join Zoom Meeting

<https://beereporting.zoom.us/j/81373886830?pwd=WaLd601qjaQxkDKvaUUxgvaZ1atBF.1>

Meeting ID: 813 7388 6830  
Passcode: 286554

Rita A. Sethi  
(she/hers)  
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**From:** Rita Sethi <[rsethi@stollglickman.com](mailto:rsethi@stollglickman.com)>  
**Sent:** Tuesday, January 2, 2024 4:58 PM  
**To:** Emanuel Kataev <[Emanuel@mlaborlaw.com](mailto:Emanuel@mlaborlaw.com)>; Andrew Stoll <[astoll@stollglickman.com](mailto:astoll@stollglickman.com)>  
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**Subject:** Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi Emanuel:

It is my understanding that all depositions are proceeding virtually. I will send you the links for Robbie Russo and Guiseppe Vacca when I receive them.

Please advise if Frank Russo is available on January 10 or January 11 for his deposition and send the link for Kalief's deposition on January 12.

Best,  
Rita

Rita A. Sethi  
(she/hers)  
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**From:** Emanuel Kataev <[Emanuel@mlaborlaw.com](mailto:Emanuel@mlaborlaw.com)>  
**Sent:** Monday, January 1, 2024 6:14 PM  
**To:** Rita Sethi <[rsethi@stollglickman.com](mailto:rsethi@stollglickman.com)>; Andrew Stoll <[astoll@stollglickman.com](mailto:astoll@stollglickman.com)>  
**Cc:** Joseph Labuda <[joe@mlaborlaw.com](mailto:joe@mlaborlaw.com)>; David Aminov <[daminov@mlaborlaw.com](mailto:daminov@mlaborlaw.com)>

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Dear Rita and Andrew:

Happy new year. I write to ascertain the format of depositions. I have not received any notice of deposition for Robert Russo, and a prior notice sent for another witness designated the deposition to proceed virtually. Kindly confirm.

Thanks and best,

**Emanuel Kataev, Esq.**  
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